



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
OREGON OPERATIONS OFFICE
805 SW Broadway, Suite 500
Portland, Oregon 97205

Reply to: 000

December 20, 2012

Mr. Bob Wyatt
Chairman
Lower Willamette Group
c/o Northwest Natural
220 NW Second Avenue
Portland, Oregon 97209

RE: Portland Harbor Superfund Site, Administrative Order on Consent for Remedial Investigation and Feasibility Study: Docket No. CERCLA-10-2001-0240
EPA Supplemental Comments on the *Portland Harbor RI/FS Draft Baseline Ecological Risk Assessment*

Dear Mr. Wyatt:

This letter provides EPA's comments and direction to the Lower Willamette Group (LWG) for completing the Baseline Ecological Risk Assessment (BERA) for the Portland Harbor RI/FS. EPA's detailed comments and direction are attached.

EPA previously provided comments to the LWG on July 10, 2012 based on our review of the *Portland Harbor RI/FS Draft Baseline Ecological Risk Assessment* (BERA), dated July 1, 2011. On September 18, 2012 LWG provided a table with LWG's response to each of EPA's comments. EPA and LWG have been working over the past three months to clarify and resolve the issues raised in LWG's response to EPA's comments, and tracking our progress by updating the LWG's response table showing the status and tentative resolution of the individual comments. Significant progress was made through that process, and EPA believes that both parties now have a good understanding of the work required to complete the BERA.

EPA's comments and direction to the LWG include the following:

- EPA's revised Executive Summary for the BERA. EPA's revised summary will replace the Executive Summary in the draft BERA. EPA's revised Executive Summary is attached and is essentially the same as the draft version that was informally shared with the LWG on December 14th.
- Comment Resolution Table. The attached table showing EPA comments, LWG responses, and comment resolution provides EPA's determination on the resolution of comments and direction on the individual elements that must be modified to complete the BERA.

- EPA revisions to Section 11 of the BERA. A redline of Section 11 of the BERA is attached showing EPA's specific changes to this Section.

Please note that EPA may have some additional edits to the text of the BERA that we expect to provide by January 11, 2013. EPA does not anticipate that additional changes to the text will require any further revision of the calculations or presentation of the results of the BERA.

We look forward to working with the LWG on the specific revisions that are needed to finalize the BERA. EPA believes it will be most productive to have our respective technical leads work together to ensure that the revisions required by these comments are completed in a timely manner and provide an approvable document. The LWG's deadline for completing the final BERA is March 30, 2013.

If you have any questions, please contact Chip Humphrey at (503) 326-2678 or Kristine Koch at (206) 553-6705. LWG's technical consultants may contact EPA's technical lead for the BERA, Burt Shephard, directly at (206) 553-6359. For legal questions, please contact Lori Cora at (206) 553 1115.

Sincerely,

Chip Humphrey
Remedial Project Manager

Kristine Koch
Remedial Project Manager

Enclosure

cc:

